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Plaintiffs in Propria Persona

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

STEVEN P. BRAZELTON, an Individual;  
NATHALIE HUYNH, an Individual; and  
JHB, an Individual,

Plaintiffs,

vs.

ROCKY MOUNTAIN HOSPITAL AND  
MEDICAL SERVICES, INC., a Colorado  
Corporation doing business as HMO  
Nevada, Anthem Blue Cross and/or Blue  
Shield; HMO COLORADO, INC., a Colorado  
Corporation doing business as HMO  
Nevada, Anthem Blue Cross and/or Blue  
Shield; BLACK CORPORATIONS 1-10, AND  
DOES I-X, INCLUSIVE,

Defendants.

Case No. 2:24-cv-00994-GMN-BNW

**STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE  
WITH LR 26-1(b)**

Plaintiffs STEVEN P. BRAZELTON and NATHALIE HUYNH, in Propria Persona, and Plaintiff JHB, by and through her attorneys Steven P. Brazelton and Nathalie Huynh (collectively "Plaintiffs"), and Defendants ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICE, INC., and HMO COLORADO, INC., Colorado Corporations (collectively "Defendants"), by and through their attorneys of record, Peterson Baker, PLLC, pursuant to FRCP 26(f)(3) and LR 26-1(b), hereby submit their discovery plan and scheduling order to the Court.

- Meeting: A Meeting was held telephonically on August 14, 2024, and was attended by Stephen Brazelton, Tamara Beatty Peterson, and Thomas Hardy.

2. Pre-Discovery Disclosures: The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) on or before August 28, 2024.
3. Anticipated Discovery: All matters.
4. Discovery Plan: The parties jointly propose to the Court the following:
  - a. Discovery cut-off date: The Defendants filed their Answers to Plaintiffs' First Amended Complaint on July 17, 2024. The last day to complete discovery will be Monday, January 13, 2025, which is one hundred eighty (180) days from July 17, 2024.
  - b. Amend Pleadings/Adding Parties: The last day to amend pleadings and/or add parties will be Tuesday, October 15, 2024, which is more than ninety (90) days prior to the discovery deadline.
  - c. Last day to extend discovery: Any request to extend a deadline set herein must be filed at least twenty-one (21) days prior to the subject deadline.
  - d. Disclosure of Initial Experts: The last day for disclosing initial experts will be Thursday, November 14, 2024, which is sixty (60) days before the discovery deadline.
  - e. Disclosure of Rebuttal Experts: The last day for disclosing rebuttal experts will be Monday, December 16, 2024, which is thirty-two (32) days after the initial disclosures of experts.
  - f. Dispositive Motions: The last day for filing dispositive motions shall be Wednesday, February 12, 2025, which is no later than thirty (30) days after the close of discovery.
5. Joint Pre-trial Order: The Joint Pre-trial Order shall be filed on Friday, March 14, 2025, which is no later than thirty (30) days after the date set for filing dispositive motions. However, in the event dispositive motions are filed, the filing of the Pre-trial Order shall be suspended until thirty (30) days after the Court enters its decision on the dispositive motion(s), if any.
6. Fed. R. Civ. P. 26(a)(3) Disclosures: The disclosures required by FRCP 26(a)(3)

and any objections thereto shall be included in the Pre-trial Order.

7. Alternative Dispute Resolution: The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

8. Alternative Forms of Case Disposition: The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, and the use of the Short Trial Program (General Order 2013-01).

9. Electronic Evidence: The parties certify that they have discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations.

10. Conferences with Magistrate Judge: ~~Before moving for an order relating to discovery, the movant must request a conference with the United States Magistrate Judge.~~

11. Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502.

The parties will submit a stipulation for a protective order regarding these issues.

12. What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.

As noted above, the parties will confer after their FRCP 26(a) disclosures and initial written discovery to discuss the need for any modifications to the standard limitations on discovery.

13. Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

The parties will be submitting a stipulation for a protective order protecting each parties' interests.

1  
2 Dated this 29<sup>th</sup> day of August, 2024

3 By:

4 //ss// Steven P. Brazelton

5 //ss// Nathalie Huynh

6 By: Steven P. Brazelton

7 Nathalie Huynh

8 601 S. Arlington Avenue

9 Reno, Nevada 89509

10 775-826-2380

11 *Plaintiffs in Propria Persona*

Dated this 29<sup>th</sup> day of August, 2024

By: /s/ Thomas C. Hardy

ReedSmith

By: /s/ Thomas C. Hardy

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*Attorneys for Defendants Rocky Mountain  
Hospital and Medical Service, Inc. and HMO  
Colorado, Inc.*

12 **IT IS SO ORDERED.**

13 Dated: August 30, 2024

14   
UNITED STATES MAGISTRATE JUDGE